

Dear Sir or Madam,

I am writing to the FCC to provide my thoughts about the current proposals that could affect the way that video relay services are provided and utilized. I have been working as a professional sign language interpreter for, at minimum, 16 years. I have worked in a wide variety of settings under a wide variety of circumstances. I have worked with people who are Deaf, Deaf-Blind, and Hard-of-Hearing. Currently, I work full time in the field of video relay interpreting, but I am also a contract interpreter with an agency that provides sign language interpreting services throughout the local community and beyond.

Currently, nearly all of the people who are Deaf, Deaf-Blind, and Hard-of-Hearing with whom I come into contact, no longer have a TTY device, more recently termed a TDD. They have either given the device away or thrown it away. Regardless, the result is the same. Those people who once had a TTY no longer have one. They now rely on Video Relay Service (VRS) equipment and interpreters to make and receive "phone" calls. I believe that VRS is a huge step in the direction of functional equivalence for the communities it is designed to serve. The Americans with Disabilities Act laid the legal groundwork for the production and implementation of VRS. Thus, I believe that VRS must remain available at least until something that provides even more functional equivalence is widely available.

Each person that uses sign language to communicate has unique communication preferences and needs. Such needs can encompass a whole host of factors: language type and/or mode; sign production, style, and speed; regional lexicon; various environmental factors that affect each person's ability to clearly see the other in a signed communication; and each individual's unique level of personal visual acuity at the time that the communication takes place.

When you consider this partial list of factors that impact any signed communication, please consider the vast range of factors that are added through VRS communication, which takes place more or less in "real time" across "high speed" internet connections that display on a variety of types of "tv monitors." The myriad communication and visual barriers that must be overcome to achieve accurate communication through VRS makes it remarkable, indeed, that such communication is usually effective.

The FCC's proposal to remove all VRS companies' Deaf-specific videophone hardware and software seems to potentially hinder the VRS process, which is already a very difficult one. VRS companies are committed to doing business with Deaf, Deaf-Blind, and Hard-of-Hearing people. Those companies are uniquely positioned to hire the very individuals that they serve and, therefore, to understand the preferences and needs of that specific community. United States government agencies or contractors will neither have as deep a level of knowledge and understanding of the communities being served nor the motivation to excel in the production of hardware and software

specifically designed for those communities. In turn, I believe the quality of VRS hardware and software will decline and, therefore, make the process of VRS less accurate, less effective, and less desirable.

The value of customized video relay hardware and software notwithstanding, the vast majority of responsibility and credit for the effectiveness of VRS communication rests squarely with the qualified, certified sign language interpreters (VIs) that facilitate it.

Interpretation is not a word-recognition, sign-matching game. It is not hearing a word and arbitrarily picking one of the many signs that could correspond to it. It is not seeing a sign and arbitrarily picking one of the many words that could correspond to it.

Interpretation is taking the meaning of a word or phrase expressed in one language and producing the meaning of that word or phrase as accurately and completely as possible in another language, retaining the original intent and affect .

Thus, VIs are not dial tones. VIs have an incomparable role in VRS calls.

Currently, the companies that produce VRS hardware and software are providing state-of-the-art products. These products make it possible for VIs to provide the remarkable level of effective communication that currently exists. If the quality or usability of either VRS hardware or software diminishes, the effectiveness of VRS communication will diminish as well.

Most importantly, though, please realize that employees are typically a company's highest cost. This is especially true in the VRS business. Experienced, capable, qualified, certified sign language interpreters are a very rare, highly skilled, and extremely limited group. You cannot go to a temp agency or place an ad to get an entire workforce of such interpreters.

No VIs means no VRS.

Thus, I urge you to provide VRS connect-minute rates for VRS companies that will ensure sufficient monies are available to continue paying VIs at current market rates as long as VRS services will be provided.

Very Truly Yours,

Joseph G. Noethlich